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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KALSHIEX, LLC,

Plaintiff,

vs.

MARY JO FLAHERTY, in her official capacity as Interim Director of the New Jersey Division of Gaming Enforcement; NEW JERSEY DIVISION OF GAMING ENFORCEMENT; JAMES T. PLOUSIS, in his official capacity as Chairman of the New Jersey Casino Control Commission; ALISA COOPER, in her official capacity as Vice Chair of the New Jersey Casino Control Commission; JOYCE MOLLINEAUX, in her official capacity as Commissioner of the New Jersey Casino Control Commission; NEW JERSEY CASINO CONTROL COMMISSION; and MATTHEW J. PLATKIN, in his official capacity as Attorney General of New Jersey,

Defendants.

Case No.: 25-cv-2152

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

This matter comes before the Court on Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction to enjoin Defendants from enforcing N.J.S.A. 5:12A-11, N.J. Const. Art. IV, § 7, ¶ 2(D), and any other New Jersey law that is used in a manner to effectively regulate Plaintiff's designated futures market against Plaintiff. Upon consideration of KalshiEX, LLC's Motion for Temporary Restraining Order and Preliminary Injunction, this Court's assessment is that, for the reasons stated in Plaintiff's motion, Plaintiff will face irreparable harm in the absence of injunctive relief. It is hereby

ORDERED that, the Defendants show cause why an order should not be issued pursuant to Rule 65 of the Federal Rules of Civil Procedure preliminarily enjoining the defendants during the pendency of this action from enforcing New Jersey state gambling laws including N.J.S.A.

1 5:12A-11, N.J. Const. Art. IV, § 7, ¶ 2(D), and any other New Jersey law that is used in a
2 manner to effectively regulate Plaintiff's designated futures market against Plaintiff; and further
3 ORDERED that, sufficient reason having been shown therefor, pending the hearing of the
4 Plaintiff's application for a preliminary injunction, pursuant to Rule 65 of the Federal Rules of
5 Civil Procedure, the defendants are restrained from enforcing N.J.S.A. 5:12A-11, N.J. Const.
6 Art. IV, § 7, ¶ 2(D), and any other New Jersey law that is used in a manner to effectively regulate
7 Plaintiff's designated futures market against Plaintiff; and further

8 ORDERED that, any opposition submission by defendants be filed by April __, 2025;
9 and that any reply by the Plaintiff be filed by April __, 2025.

10 This order shall become effective immediately.

11 SO ORDERED ON THIS ____ day of ____, 2025.

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14 Judge, United States District Court
15 for District of New Jersey
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